

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	C.A. No. 20-613-SB
)	
Plaintiffs/Counterdefendants,)	JURY TRIAL DEMANDED
)	
v.)	
)	PUBLIC VERSION
ROSS INTELLIGENCE INC.,)	
)	
Defendants/Counterclaimant.)	

**DECLARATION OF GABRIEL M. RAMSEY IN SUPPORT
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S REPLY IN
SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT ON ITS AFFIRMATIVE
DEFENSE OF FAIR USE**

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I, Gabriel M. Ramsey, declare as follows:

1. I am a partner at Crowell & Moring, LLP, lead counsel of record for ROSS Intelligence, Inc. I am an attorney, admitted to the California and District of Columbia and have been admitted *pro hac vice* with this Court. I submit this Declaration in support of Defendant/Counterclaimant ROSS Intelligence Inc.’s (“ROSS”) Reply In Support of Its Motion for Summary Judgment on Its Affirmative Defense of Fair Use.

ROSS’s Classification Spreadsheet

2. Below is a modified chart comparing the LPO classifications that Plaintiffs claim ROSS copied, the date those topics appeared in the West Key Number System, and the topics ROSS created as part of its classifier project.

3. The first column represents the LPO classification topics as they appear in the LPO Classification Spreadsheet. (*See* D.I. 281-30, Ex. 54; *see also* D.I. 281-3, Ex. 26 at . 41-43.)

4. The second column shows the dates the topics in the first column were added to the West Key Number System. (See D.I. 277, Exs. 4 & 5.)

[illegible]

[illegible]

[illegible]

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at San Francisco, California on February 13, 2023.

/s/ Gabriel M. Ramsey

Gabriel M. Ramsey